

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Najwa Alkhatib	Debtor(s)	CHAPTER 13
MIDFIRST BANK	Movant	
vs.		
Najwa Alkhatib	Debtor(s)	NO. 19-17973 AMC
William C. Miller Esq.	Trustee	11 U.S.C. Section 362

**MOTION OF MIDFIRST BANK
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is MIDFIRST BANK.
2. Debtor(s) is/are the owner(s) of the premises 6214 Webster Street, Philadelphia, PA 19143, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$83,331.00 on the mortgaged premises that was executed on May 30, 2003. Said mortgage was recorded on July 2, 2003 at Document ID Number 50704543. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on August 5, 2008, at Document ID Number 51948139 in Philadelphia County.
4. William C. Miller Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$641.56 with monthly late charges totaling \$51.32 for the months of February 2020 through April 2020.
7. The total amount necessary to reinstate the loan post-petition is \$1,976.00.
8. Movant is entitled to relief from stay for cause.

9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant